

<p>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-2(c)</p> <p>WARREN S. JONES, JR., ESQUIRE Bar #003781980 Law Offices of Warren S. Jones, Jr., LLC 1 Trinity Lane Mt. Holly New Jersey 08060 (609) 261-8400 (609) 261-5252 fax email@warrensjones.com</p> <p>In Re: Joanna L. Garrison</p>	<p>Case No.: <u>22-17461</u></p> <p>Judge: <u>Mark E. Hall</u></p> <p>Chapter: <u>13</u></p>
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CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION
 CREDITOR'S MOTION or CERTIFICATION OF DEFAULT
 TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT

The debtor in the above-captioned chapter 13 proceeding hereby objections to the following:

1. Motion for Relief from the Automatic Stay filed by MTGLO Investors, L.P., creditor,

A hearing has been scheduled for 2/11/2025 at 09:00 a.m.

OR

- Motion to Dismiss filed by the Standing Chapter 13 Trustee.

A hearing has been scheduled for , at _____ a.m.

- Certification of Default filed by _____, creditor,

I am requesting a hearing be scheduled on this matter.

OR

- Certification of Default filed by Standing Chapter 13 Trustee

I am requesting a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons

- Payments have been made in the amount of \$_____ but have not been accounted for. Documentation in support is attached hereto.
- Payments have not been made for the following reasons and debtor proposes repayment as follows:
- Other: A modified plan was filed on this date with a claim to be paid in full (4g) in the amount of \$33,973.12. This amount represents expected mortgage payments that shall come due in the remaining months of the plan. This amount is subject to change upon the filing of a Notice of Payment Change. This provision shall provide for conduit mortgage payments to be paid through the plan. The plan also provides a payment of \$12,312.16 in 4g which represents this post-petition delinquency to Shellpoint. This provision shall provide for a capitalization of same. This modified plan is intended to resolve this motion.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 1/14/2025

January 15, 2025 /s/ Joanna L. Garrison
Debtor's Signature

NOTE:

1. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor at least seven (7) days before the return date pursuant to D.J.N.J. LBR 9013-(d), if filed in opposition to a Motion for Relief from the Automatic Stay or Trustee's Motion to Dismiss.
2. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor within 14 days of the filing of a Creditor's Certification of Default (under an Order Resolving Motion to Vacate Stay and/or Dismiss with Conditions) or a Trustee's Certification of Default.

If this form is not filed the Motion or Certification of Default will be deemed uncontested and no hearing will be scheduled.

Rev. 8/15/15